

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

BRYAN GLOVER and BARBARA
GLOVER, husband and wife,
Plaintiffs

v.

MARVIN WINDOWS and DOORS,
a/k/a MARVIN WINDOWS, a/k/a
MARVIN LUMBER AND CEDAR
COMPANY, a/k/a MARVIN WOOD
PRODUCTS,
Defendant

Civil Action No. 04 – 209 Erie

Judge Sean J. McLaughlin

JURY TRIAL DEMANDED

AFFIDAVIT OF BARBARA GLOVER

I, BARBARA GLOVER, hereby attest and aver under oath as follows:

1. My name is Barbara Glover.
2. I am employed by Howard Hanna as an advertising assistant.
3. My husband is Bryan Glover, and we currently reside at 11467 Eureka Road, Edinboro, PA
4. In the summer of 1996, construction on our home at 11467 Eureka Road began.
5. In the fall of 1996, the Marvin Integrity Windows were delivered and installed in our house during construction. The house was not completed when the windows were installed.
6. In the winter of 1996-1997, my husband and I observed condensation on the windows throughout the house. I was not concerned with the condensation on the windows as it was my understanding that condensation can occur on windows while the home is under construction and unoccupied.
7. The condensation on the windows would only occur during the winter months or the "heating season".

8. In late August 1997, my husband and I moved into the house at 11467 Eureka Road in Edinboro, Pennsylvania. The house was still under construction.

9. In the winter of 1997-1998, condensation again appeared on the windows, however, we did not think anything of it since the house was still new, and condensation is a common side effect of the "settling process" involved with new construction.

10. In the spring of 1998, thirteen (13) of the original thirty-two (32) windows were replaced due to problems with the wood used to make the windows becoming "soft" due to a defect unrelated to the condensation.

11. In the winter of 1998-1999, the condensation problem continued following the replacement of the windows, however, the cause of the condensation problem was uncertain and the wood around the windows appeared to be unaffected. We again attributed the condensation problem to the newly constructed home and the settling process.

12. In the winter of 1999-2000, the condensation reappears on the windows throughout the house, and we became concerned that this was continuing to occur. I began asking around to see if anyone had any ideas as to the cause of the condensation problem.

13. Then in the winter of 2000-2001, my husband and I contacted the distributor from whom we purchased the windows regarding the possible problems with the windows. We were directed to a new representative, A.W. Hastings and arranged for a Hastings' representative to come to our home to inspect the windows. The representative never came to inspect the windows, and Hastings did not return our calls.

14. In the summer of 2001, my husband and I were informed by a Marvin Windows corporate representative that the problem was not with the windows, but with

the humidity in our home. We checked the humidity levels, but everything was within reasonable limits.

15. In the fall/winter of 2001, my husband and I again call Marvin Windows for assistance. I was again told that the problem was with the humidity in our home and not with the windows, and received a packet of information from Marvin regarding condensation on windows and the many causes of the condition.

16. By the end of 2001, the windows were beginning to show signs of decay, and ice is beginning to form on the inside of the windows. I again call Marvin and am told that we will be contacted in the fall of 2002 to set up an appointment for a representative from Marvin to come and inspect the windows.

17. In December 2002, my husband and I were informed that a representative from Marvin would be coming in January 2003 to inspect the windows. During the inspection, the representative tested the humidity levels in our home which fell within the warranty guidelines and stated that he "doesn't know what is wrong with the windows" but assured us that "Marvin Windows stands behind its windows and that the problem will be taken care of."

18. In late January 2003, my husband and I were contacted by a customer service representative from Marvin who indicated that he had concluded that the problem we were having was a humidity problem with our home, and not a problem with our windows.

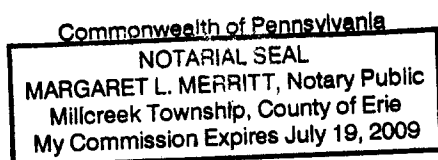
19. I attempted to contact Marvin on a number of occasions in February 2003, however, no one from Marvin would ever respond to my e-mails or phone calls.

FURTHER, Affiant sayeth not,

Barbara Glover
Barbara Glover

Sworn to and subscribed before me
this 22 day of July, 2005.

Margaret L. Merritt
Notary Public



E

April 5, 2004

To Whom it May Concern:

On March 28, 2004, at the request of Mr. and Mrs. Glover, I conducted an inspection of their home, windows and French doors to ascertain the underlying cause for the deterioration of all of the windows and doors throughout their home. During the inspection at their home I noted that their windows and French doors were in various stages of deterioration. I observed that the wooden cladding was extremely deteriorated. Upon closer examination, I noted that the wood was black with decay, moist, and could be easily peeled away with something as simple as a fingernail on the surface.

I have owned my own business "Duane Davis Construction" for the past 20 years, specializing in new homes, replacement windows, additions, remodeling, garages, siding, home maintenance and seamless gutters. Prior to starting my business I worked an additional 10 years with another contractor in the same field.

I observed that the Glover residence is soundly constructed, that the windows and doors were installed properly, and that there was no evidence of moisture or water damage anywhere within their home. The basement was dry.

Mr. Glover directed my attention to an extra window that he had in the basement, which was the same exact window that was installed elsewhere in his residence. With his permission I disassembled the window and came to the following conclusions concerning the cause for the numerous problems the Glovers are having with their Marvin Integrity windows and doors. It is my belief that the failure of the rubber seal is allowing air to leak in around the glass and enter the home. The air is leaking between the outside frame and the glass as well as the glass and the wood cladding. The windows and doors are not constructed out of poor quality materials, but rather are ASSEMBLED POORLY. The reduced amount of and poor adhesive quality of the rubber sealant as well as the fit of the glass to the outside frame is causing the cold air from the outside to enter the home and is causing the excessive moisture, and ice on the windows and doors resulting in the current conditions that I observed.

I also noted mold and green algae growing between the outside frame and glass; down in the sealant, further proving that the sealant used in the construction of the windows and doors at the Glover residence has failed and is the cause for the present condition of their windows and doors.

Sincerely,

Duane Davis
Duane Davis Construction
12260 Ridge Avenue
Edinboro, PA 16412

DUANE DAVIS 
CONSTRUCTION
NEW HOMES, ADDITIONS, REMODELING,
GARAGES, REPLACEMENT WINDOWS, SIDING,
SNOW REMOVAL, HOME MAINTENANCE
PHONE (814) 734-1145
EMAIL daviscon@velocity.net
12260 RIDGE AVE.
EDINBORO, PA 16412

F

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

BRYAN GLOVER and BARBARA
GLOVER, husband and wife,
Plaintiffs

v.

Civil Action No. 04-209 Erie

MARVIN WINDOWS and DOORS
a/k/a MARVIN WINDOWS, a/k/a
MARVIN LUMBER AND CEDAR
COMPANY, a/k/a MARVIN WOOD
PRODUCTS,
Defendants

Deposition of MERVIN TYLER, taken before
and by Sondra A. Black, Notary Public in and for the
Commonwealth of Pennsylvania, on Monday, June 13,
2005, commencing at 11:37 a.m., at the offices of
Marshall Dennehey Warner Coleman & Goggin, 1001 State
Street, Suite 1400, Erie, Pennsylvania 16501.

For the Plaintiffs:

Bryan D. Fife, Esquire
Quinn Buseck Leemhuis Toohey & Kroto, Inc.
2222 West Grandview Boulevard
Erie, PA 16506

For the Defendants:

G. Jay Habas, Esquire
Marshall Dennehey Warner Coleman & Goggin
1001 State Street, Suite 1400
Erie, PA 16501

Reported by Sondra A. Black
Ferguson & Holdnack Reporting

I N D E X

MERVIN TYLER

| | |
|--|----|
| Direct Examination by Mr. Habas..... | 3 |
| Cross-Examination by Mr. Fife..... | 24 |
| Redirect Examination by Mr. Habas..... | 33 |
| Recross-Examination by Mr. Fife..... | 34 |
| Further Redirect Examination by Mr. Habas..... | 36 |

EXHIBITS

| | |
|---------------------------------|---|
| Tyler Deposition Exhibit A..... | 6 |
| Tyler Deposition Exhibit B..... | 6 |

1 M E R V I N T Y L E R, first having been
2 duly sworn, testified as follows:

3
4 DIRECT EXAMINATION

5 BY MR. HABAS:

6
7 Q. Sir, can you give us your full name, and spell your
8 last name for our court reporter.

9 A. Mervin Leroy Tyler, T-Y-L-E-R. My nickname is
10 Butch. That's why you'll see some things signed here as
11 Butch.

12 Q. Where do you currently live?

13 A. 6110 Swanville Road, Erie 16506.

14 Q. What's your highest level of education?

15 A. One year of college at Gannon.

16 Q. What did you study there?

17 A. Mechanical engineering.

18 Q. Any certifications or other education?

19 A. Um-hum. I am a union carpenter, and had my own
20 business for 26 years under the name Tyler Construction,
21 filed with the State. I have various certifications through
22 Pella Window. I was in their CPC program, Certified Pella
23 Contractor. The first one in the Erie area.

24 Q. What years did you operate Tyler Construction?

25 A. 1972 through '97. Closed it because of personal

1 injuries due to doing too much myself.

2 Q. How long have you been with Pella?

3 A. Eight years.

4 Q. '97 to present?

5 A. To present, yes.

6 Q. Is that a full-time position?

7 A. Yes.

8 Q. Are you the owner of the local franchise?

9 A. No. No. It is not owned locally. It is a
10 franchise out of Bedford Heights, Ohio.

11 Q. What is your position with Pella?

12 A. Outside sales.

13 Q. Any other positions with the company?

14 A. No. I -- I have had, yes, but present position is
15 outside sales.

16 Q. How long have you had that position?

17 A. Three years.

18 Q. What other positions have you held with that
19 business?

20 A. I started as an inside, part-time order entry and
21 showroom -- that position has changed so much. What was it
22 called. It was inside sales, and you were doing quoting and
23 order entry.

24 Q. Any other positions that you've held?

25 A. Then that went to full-time inside sales, then that

1 became full-time outside sales.

2 Q. Have you held any other employment positions in the
3 last five years?

4 A. No. No.

5 Q. Have you been involved in any lawsuits yourself or
6 with any of your businesses?

7 A. No. No.

8 Q. Have you had any experience with Marvin or Integrity
9 windows or doors?

10 A. No, I haven't. I mean, I know them. I know the
11 competition, what's out there, but no, I have not.

12 Q. Have you ever sold windows or doors for either
13 Marvin or Integrity?

14 A. No.

15 Q. You were asked to bring with you any documents you
16 may have concerning the Glovers as set forth in your
17 subpoena, and you provided us today with copies of documents
18 which we previously obtained, and we will mark these as
19 exhibits to your deposition. The first one is a one-page
20 which I will characterize as an estimate. Would that be fair
21 to say?

22 A. Sure.

23 Q. And that'll be the first exhibit. I'll mark that as
24 A. And the other is what's identified as a Proposal, and it
25 is a six-page document. Does that appear to be correct?

1 (Tyler Deposition Exhibits A and B marked for
2 identification.)

3 A. Yes.

4 Q. And you have copies in front of you?

5 A. Certainly do.

6 Q. Now, the first item, Exhibit A, looks to be an
7 estimate or proposal dated 6/24/04 on behalf of the Glovers
8 for their home in Edinboro; is that correct?

9 A. Correct.

10 Q. Can you tell me the circumstances under which you
11 gave or were asked to give that estimate?

12 A. Barb Glover gave me a phone call at the office and
13 requested an estimate on the entire house of windows. And I
14 ask how many windows and doors would I be estimating to allot
15 that amount of time whenever I set the appointment to go
16 ahead and be fair to the customer. And that's about all the
17 information I need to know.

18 Because if they're asking us for an estimate, we're
19 not supposed to prequalify. We're supposed to go. So I did.
20 And I went out to the house and I actually didn't meet
21 Mrs. Glover because timing was such that Bryan was there.
22 And we went over everything in the house, and I just measured
23 every window and every door in the house that he wanted
24 replaced.

25 I can sometimes give a quote right in the home with

1 a laptop, but 30 windows and a couple doors is just too much.
2 So I took all the information and all my sizes and went back
3 to the office and prepared a quote for them. And per their
4 request -- I'm pretty sure I faxed it off to them. That's a
5 year ago. I think I faxed it. But anyhow, I either faxed it
6 or I dropped it off at Barb's work out there at Howard
7 Hannah.

8 And they had told me that the windows were being
9 replaced because of the condition of the windows and the
10 damage that had been done, and they had -- Bryan took me down
11 in the basement and showed me the sash that he had already
12 replaced and -- that had failed, also. He had been furnished
13 some sash, put them in, and subsequently those failed. So he
14 said he did not want to keep doing that. So he wanted an
15 estimate to go ahead and replace all the windows.

16 He said, this is going to be -- we're trying to get
17 some moneys to help us with this because the windows are
18 failing, the product that is sent is also failing, so he
19 didn't want to continue down that path again and again. And
20 I said, it doesn't matter to me. I mean, I'm here to give
21 you an estimate on windows. If there's nothing in the wall,
22 I'm still going to give you an estimate on the window. It
23 doesn't matter. We're taking that out and we're putting our
24 product in if that's what you want.

25 Q. Now, when Barbara Glover called you initially, what

1 did she tell you, if anything, about the reason they were
2 asking for an estimate?

3 A. 30 windows, a couple doors, needed an estimate.
4 She's familiar with the product being a Realtor, and, you
5 know, we do seminars sometimes to different realty firms. So
6 she could have easily sat in on one of the seminars and seen
7 our product to go ahead and be interested in using our
8 product as her replacement.

9 Q. Did you have any relationship with the Glovers,
10 either personally or professionally, before this?

11 A. I didn't know them from anybody. I mean, I'm a
12 lifer in -- from Erie, but I did not know the Glovers.

13 Q. When you met Mr. Glover at the home, was that on
14 June 24, 2004?

15 A. No. Actually, I probably have that date because I
16 have my preliminary paperwork. Let's see if this has a date
17 on it. One day, 6/23 because this is -- well, I'm sorry,
18 6/17. There's my appointment right there. 6/17 was my
19 appointment with them, and this would be on a program in our
20 computers to when that was -- but 6/17. I need to look at
21 the earliest date, and that's when it was.

22 Q. What's the 6/23/04 date reflect?

23 A. 6/23 is when I took all of this information and
24 created this quote. So I could get those exact dates, but
25 I've got 6/17 here, and then 6/23 was preparing, and 6/24 is

1 when I wrote it up and gave it to her. So things happened
2 within a week.

3 Q. After submitting the quote, which you have
4 identified as 6/24/04, and it's Exhibit A, did you have any
5 further conversations with the Glovers?

6 A. I should have brought that. There's a -- there's a
7 sales logics program in our computer. If -- if you permit
8 me, I can either call right now, there is somebody at the
9 office that could look this up, or I could furnish you that
10 information -- those dates. There was a couple phone calls,
11 I want to say almost three, four months in between, something
12 like that. We're required by my company, when we furnish a
13 quote to somebody, to follow up on it. I mean, they've spent
14 money to have us go out there, they wanted to know what's
15 happening. Just, you know, common business sense. You don't
16 just keep quoting everything and not make any follow-up phone
17 calls.

18 So, yes, I have had a couple follow-up phone calls.
19 And they said, nothing is happening. You know, we're still
20 trying to go ahead and get some moneys to do the project.
21 They don't have the money to go ahead and do it themselves,
22 so they need to come up with some moneys to do it. And I
23 never revisited the house. It was just a couple phone calls,
24 and they said, it's still active. We still need to do it.
25 We don't have the money to do it. You know, we're trying to

1 get reimbursed or somehow get the money to do the project.

2 Q. Just so I'm clear, sir, was it your understanding
3 that the Glovers had already decided to replace the windows
4 when they called you?

5 A. They were asking me for a quote. They didn't say
6 they had decided to or not. Condition of the windows, and
7 what I was being shown, warrants them to be replaced. I
8 don't see them living with that condition. So I don't think
9 there was ever a question as to the need or a time frame. It
10 was just a matter of, they didn't have the money to do it.
11 They needed to start to get an estimate from a like window to
12 go ahead and use as a replacement so they would have some
13 direction as to where to go and what to do. What is it going
14 to cost them, and what can the company offer them in a window
15 like theirs.

16 Q. I guess what I'm getting at is, I want to make sure
17 I understand why you were asked to come out there. And from
18 your testimony it sounds like you were asked to come to the
19 Glovers' home to give an estimate for the cost to replace the
20 windows; is that accurate?

21 A. Yes.

22 Q. You were not asked to come and look at the windows
23 themselves to evaluate their condition; would that be
24 correct?

25 A. No. That was shown to me.

1 Q. But that was not the reason why you were called out
2 to the home?

3 A. Not to evaluate. To give them an estimate so that
4 they could go ahead and get the problem fixed. That was the
5 reason I was there. I mean, I wouldn't have gone through all
6 of this if I was just there to go ahead and give them an
7 expert opinion on what is going on with their windows. I
8 mean, that has been -- my whole career is windows and doors.
9 So I wasn't there just to give them an opinion. I was there
10 to give them a quote on what a Pella solution would be for
11 their problem.

12 Q. And prior to being asked to come out to the house
13 and give a quote, you had not been asked to evaluate the
14 windows themselves as to the reason they were in the
15 condition they were in?

16 A. Never saw them. I was never at the house. That
17 time that I measured these windows was the first time I ever
18 went to their house.

19 Q. Did you have the opportunity, when you went out to
20 the Glover home, to actually see or inspect any of the
21 windows that were in the home itself, other than what might
22 have been laying loose in the basement or disassembled?

23 A. Every one.

24 Q. Did you take any of them out of their frames?

25 A. No. We opened windows, but we did not remove sash

1 from frame or frame from rough opening. We did not.

2 Q. Can you tell me what you did when you looked at the
3 windows. What was your process in terms of inspecting them
4 and looking at them?

5 A. If it was a window that would open, we would unlock
6 and crank the window out. I would look at the window from
7 the inside, all of the areas that frame was making contact
8 with sash or weather stripping making contact with sash to
9 look at that, then go outside and look underneath the sash
10 and look at the frame from outside just to get an idea of
11 what was happening.

12 Q. When you looked at the windows from the outside, did
13 you see any defects in either the frame or the sash?

14 A. The sash had the seal failure happening on the sash.
15 Which, you know, a 9-year-old kid could have seen that. I
16 mean, there was nothing that was rocket science to see that
17 was taking place. You could --

18 Q. What did you observe about seal failure on the
19 outside of the windows?

20 A. That's what my pictures will also show because I did
21 take a couple pictures of the edge of the sash showing that
22 water had migrated in and was getting at the wood on the
23 inside of the window -- of the sash and causing it to
24 deteriorate.

25 Q. Were you able to determine the source of that water

1 or where it was coming from?

2 A. No, I was not. I -- I was not there to cut a sash
3 apart or do any of that. And there are sash that could be
4 cut apart to determine that, and that is one of the ways that
5 you need to do that, is to go ahead and cut the sash and see
6 where it is migrating and cut right through it diagonally and
7 see what has breached.

8 Q. Was it your understanding that the source of the
9 water would have been from the exterior of the home?

10 A. That was happening to the sash, yes. Yes.

11 Q. Did you have any discussion with Mr. Glover about
12 that?

13 A. He was showing me the sash that he had already
14 replaced, kept everything that he tore out -- he was showing
15 me those, and he had actually had a couple sets of those that
16 had failed. He was showing me that, and I said, yeah.
17 It's -- they're shot. I mean, nothing that I know you can do
18 to them to make them right again to be able to be used.
19 Just, you know, keep replacing what they're sending. And he
20 said he wasn't willing to go ahead and go that route for very
21 much longer.

22 Q. Now, this is in terms of your -- looking at the
23 windows from the outside, correct? Initially you were
24 looking at the windows from the outside?

25 A. I was doing everything. I was -- we were inside and

1 opened the window, you would look at that. You would go
2 outside and you would look at the remainder of the window
3 that you couldn't see when it was closed. And we were
4 looking at the sash. I mean, I was looking at everything all
5 the time.

6 Q. I'm just talking about your outside view of the
7 windows first.

8 A. Okay.

9 Q. So we talked about from the outside you could see
10 the sash had water that had migrated inside.

11 A. Yes.

12 Q. You also said that there had been what you believed
13 was seal failure. Can you describe what you mean by that.

14 A. A breach of the ability for that window sash to keep
15 water from passing by the cladding, whatever it -- the
16 material might be, and the glass -- to keep the water from
17 passing by that point.

18 Q. In terms of the seal failure, what did you
19 understand the seal of that window to be?

20 A. The cladding should keep water from getting past the
21 point of cladding-to-glass contact. And if it gets past
22 that, then the next material is wood.

23 Q. In terms of this seal where you identified a
24 failure, can you tell me what area of the window you're
25 talking about, the exterior window or the interior window or

1 some point in between?

2 A. What I saw there was exterior.

3 Q. Could you identify the nature of the seal that you
4 were looking at, what would the --

5 A. I don't know what products they use, no.

6 Q. What did it look like in terms of the product?

7 A. Without cutting through it, I could not tell.

8 Q. Did it look like it was rubber?

9 A. I don't know.

10 Q. Why did you believe there was a seal failure on the
11 exterior of the window?

12 A. Looking at the edge, and one of the pictures, shows
13 that the damage had occurred right at the juncture of the
14 exterior cladding and the wood.

15 Q. You're saying that's captured in your photographs?

16 A. It is captured in the one photograph, yeah.

17 Q. Would we be able to identify that photograph readily
18 from the disc that you gave us?

19 A. Yes. It is a photograph of a sash still in the
20 frame, still in the house. Not a loose sash that he had
21 taken out.

22 Q. In terms of looseness, did you identify that there
23 was any looseness or give in any of the windows or frames
24 when you were inspecting them?

25 A. Did not. Didn't see any of that.

1 Q. Did you press on the glass to see if there was any
2 give or looseness within the frame of the window?

3 A. I did not.

4 Q. Did Mr. Glover say anything to you about that? That
5 the windows moved or vibrated or anything like that?

6 A. No, he did not. No.

7 Q. Did you have any other observations about the
8 windows from the outside, other than what you've already told
9 us?

10 A. No.

11 Q. What did you observe about the windows from the
12 inside?

13 A. The wood on the lower portion of the window was
14 rotting.

15 Q. On all the windows?

16 A. On the sash -- I don't know if I looked at every
17 window in the house because I was asked to give a whole-house
18 estimate of the windows and doors. The couple doors and the
19 windows seemed to be about in the same condition, and there
20 was, you know, rotting on -- happening on the inside of
21 windows and frames. But I can't say that it was, you know,
22 every window in the -- in the house. I cannot say that.

23 Q. What else did you observe about the inside of these
24 windows?

25 A. Across the bottom, and it was on sash and frame in

1 the majority of the windows, the contact of the wood to the
2 glass area was rotting. The windows that we opened up, the
3 sash was rotting. All of the wood on the bottom and coming
4 up the sides of the sash was also rotting. Fixed windows,
5 there was no way to determine how far it had gone. We could
6 not open those, but the rotting was also taking place on --
7 on the frames on the lower portions of the windows.

8 Q. Did you take apart any of the windows to inspect
9 them?

10 A. I did not take anything apart. Unlocked and opened
11 only. Did not cut any windows apart. Did not take any --
12 any screws out of any windows or disassemble any parts of the
13 window, other than unlocking and opening.

14 Q. Did Mr. Glover show you any windows that he may have
15 had in his basement, or elsewhere, that had been removed from
16 the frames and that he had disassembled or taken apart in any
17 way?

18 A. Not taken apart at that time, no.

19 Q. What did he show you about the windows that he did
20 have?

21 A. He had a -- a section of -- a set of windows -- a
22 set of sash that he had taken out that had rotted, and he
23 showed me the -- what would be the bottom of the sash where
24 the rotting was taking place. All the way around the edge of
25 the sash, mainly on the rail. It would start to come up the

1 style of the sash a little bit, but it was mainly on the
2 rail. And he showed me numerous sash that he had done, and
3 had them separated as to this was done first, and new ones
4 were put in. This is a set that was my second set that was
5 to replace those. So some of the windows he had replaced a
6 couple times. And some he had only replaced once, and all
7 the windows that I looked at in the house, they needed
8 replaced. Whether it would have been the first time or
9 second time, I did not know that. So he had been doing this
10 twice on some of the windows.

11 Q. So it was your understanding that some of the
12 windows had actually been replaced twice?

13 A. Yes. Yes.

14 Q. Do you know about how many?

15 A. I -- he would have those numbers. I was not
16 interested in that. My job was there to give them an
17 estimate on what they wanted. I mean, they -- that's what my
18 position was when I went to their house. I mean, I didn't
19 really want to get involved in anything more than that. I
20 was there to give them a quote on windows.

21 Q. Did you provide the Glovers with any explanation as
22 to why the wood that you identified was rotting?

23 A. We have that ourselves in our windows of some
24 vintages occasionally, so I am quite familiar with seal
25 failure. So I said, this looks like it has failed, the

1 ability to keep the water out, and it needs replaced. I
2 don't think I would have been there if there wasn't a problem
3 like that.

4 Q. Did you give any other explanation to the Glovers,
5 other than seal failure, for the rotting?

6 A. Not without going ahead and cutting something open
7 diagonally and, you know, doing some lab tests on it. I did
8 not have that -- I did not have that -- the ability at that
9 time, or the tooling at that time, to go ahead and give them
10 anything else -- any other explanation.

11 Q. In terms of the seal failure, that's the exterior
12 seal that you had previously described?

13 A. That's -- that's what I saw, yes.

14 Q. Now, in terms of your quotation, Exhibit A, it looks
15 like the quote is for a total amount of \$44,363; is that
16 accurate?

17 A. Yes.

18 Q. Was that to replace all of the windows and doors in
19 the home as well as to install and remove the old ones?

20 A. Yes, it was. Under "Proposal Summary," we -- on the
21 same page --

22 Q. Yes.

23 A. -- we have, "Remove the existing window and door
24 units and install the Pella units. Fully insulate and seal
25 around the window and door units. Supply and install

1 interior casing and capping when applicable. And clean and
2 haul away all the job-related debris."

3 Q. Now, did these Pella windows have interior wood
4 cladding?

5 A. Yes.

6 Q. And outside vinyl cladding, I assume?

7 A. Aluminum. Pella manufactures with aluminum. We
8 don't manufacture with wood. So this is as close of a
9 product as I can offer to what is in the home now. Because
10 we are wood -- there are no grills, the wood divider bars,
11 there are no shades, they are conventional flat screens. So
12 everything is as close, apples to apples, in our product line
13 as what is in the home. We do have different products, and
14 I'm sure Marvin does, too, but this is as close as I could
15 offer them a quote on.

16 Q. Were these custom windows or were these standard
17 sizes?

18 A. These are standard.

19 Q. So they wouldn't have to have any special
20 customization of these?

21 A. No. No.

22 Q. Now, Exhibit B, the six-page document, can you
23 describe for us what this is.

24 A. Um-hum. Exhibit A is very basic, where we are
25 giving a synopsis of what we're doing, 30 windows, two doors,

1 low E Argon, wood interior, white aluminum exterior, and
2 screens. Then we go into Exhibit B, giving a room location
3 and stating what is going in there. Whether it is an opening
4 window, a single opening window, a twin opening window, a
5 fixed window. We're trying to give them a little bit of
6 detail per room so that you can see that we would be giving
7 them the same thing that is in there. We're not changing any
8 openings. Like the dining room has a Quantity 1, twin,
9 double-hung window, they both open. So we're not changing
10 that to put transoms above it or doing anything different
11 than what is in the opening right now.

12 So as you go down through here, you can see that
13 every room is detailed with just a description as to, yes,
14 left-hinge and right-hinge casement, two casement windows
15 that open or just a single casement window. Or a
16 center-hinged French door, because we could provide a
17 side-hinged double French door, but that is not what they
18 have in the home. Then we get into -- okay. In the living
19 room, they have a quantity of four trapezoids in their --
20 isn't it four -- yes, four trapezoids in that cathedral
21 ceiling wall, and those, of course, are fixed. So that's
22 what -- Exhibit B is giving a detailed room location showing
23 that item per item we are providing them with what they have.

24 Q. Did you evaluate the level of moisture or humidity
25 in the home?

1 A. No, I did not.

2 Q. Did you evaluate whether there was any air leakage
3 around or through the windows?

4 A. No, I did not.

5 Q. Were you asked to perform any testing of the windows
6 themselves in any way?

7 A. No.

8 Q. Now, I take it from your experience in the window
9 industry you're aware that condensation can occur on the
10 interior surface of windows?

11 A. Certainly.

12 Q. And that's not an unusual phenomenon?

13 A. Not at all. High humidity level in the house will
14 cause condensation certainly.

15 Q. Certainly that condition is greater in the winter,
16 or heating months, when you have cold outside temperatures
17 and warmer inside temperatures?

18 A. Certainly.

19 Q. And the Pella windows that you were offering to the
20 Glovers, you could not guarantee that they would also not
21 have condensation on the interior, could you?

22 A. If the humidity level is kept in check in the house,
23 and the windows are properly installed -- there are
24 guidelines for humidity levels to perform at an acceptable
25 level in every house under a decrease -- decreasing

1 graduating scale for the outside temperature and the
2 humidity. So what humidity will show up on a window is in
3 direct proportion to what the outside temperature is. And
4 that's on a scale. That is published. I don't have that
5 documentation with me. I'm sure you do.

6 Q. That's pretty standard in the industry?

7 A. Yeah. It's standard, yeah. It's not published by
8 window manufacturing. It's done by testing labs.

9 Q. When you met with the Glovers, did they ask you any
10 questions about the ability of these Pella windows to
11 withstand or prevent condensation on the inside of the
12 surface?

13 A. No.

14 Q. Did they ask you any questions whatsoever about
15 humidity or condensation on the windows?

16 A. No.

17 Q. They were just interested in replacing the windows?

18 A. Because of the failure of the windows that they had
19 in there, they wanted to replace those.

20 Q. And they did not ask you to evaluate the cause of
21 that window failure, did they?

22 A. No. No. I was there to provide them with a window
23 estimate. Mr. Glover showing me the rotted sash and what was
24 going on was, you know, more information than I needed.

25 Q. In your experience, you've seen rotted sashes on

1 other types of windows?

2 A. Yes.

3 MR. HABAS: I don't have any more questions. While
4 we were taking your deposition, we did have the
5 disc that you provided to us downloaded so we could
6 obtain copies of those pictures.

7 THE WITNESS: Sure.

8 MR. HABAS: Bryan.

9

10 CROSS-EXAMINATION

11 BY MR. FIFE:

12

13 Q. Mr. Tyler, just to go back over some things real
14 quick. You had a construction company, you indicated,
15 between '72 and '97?

16 A. Yes.

17 Q. What type of construction work did you do?

18 A. I, at first, started doing remodeling, some roofing
19 and siding, and then I had blown-in insulation and
20 ventilation company as a sideline. Then I was approached by
21 Pella Window to go ahead and become an installer. They did
22 not have anybody in the area, and I was using some of their
23 product in some projects that I was doing, and I was
24 approached to go ahead and become an installer for Pella
25 windows. And I became that -- the first one in the area, and

1 that consumed most of my work until I gave the business up in
2 '97.

3 Q. So you've had experience in installing windows
4 during the time that you were in the construction business?

5 A. Yes.

6 Q. When you went to the Glover home and were looking at
7 the windows and whatnot, did there appear to be any problem
8 with the installation?

9 A. Not that I could see at all. Not where the problem
10 was happening.

11 Q. I'm not a window expert so you're using some terms
12 that I just want to make sure that at least what I'm talking
13 about is exactly what you're talking about. You talked about
14 the sash before.

15 A. Um-hum.

16 Q. What are we talking about, in particular -- when you
17 said the outside part you could tell that the sash had
18 failed, what are we looking at when you're describing that?

19 A. The sash is the part of the window that, when you
20 unlock it, it will move to give you ventilation. Whether it
21 moves up and down, out, out as an awning window -- it is the
22 moving part of the window that provides you with the ability
23 to have ventilation.

24 Q. So it's the window itself?

25 A. Yeah. I don't think these -- I can't see through

1 the blind. It is the moving part of the window that has the
2 glass and the immediate material around it, whether it be
3 wood, aluminum, vinyl. It is that portion of the window
4 that, after unlocking the window, it will move in some
5 direction to let ventilation through.

6 Q. You had indicated the sash had failed when you were
7 taking a look at these windows from the outside.

8 A. That's where we could see that the water had
9 migrated through to go ahead and affect the wood to start it
10 to rot.

11 Q. What wood are we talking about?

12 A. They have a clad window on the outside and then wood
13 on the inside.

14 Q. I'm just going to show you a picture of what --
15 these are pictures that the Glovers had shown us, and I'm not
16 asking you anything but just to identify. Is this the wood
17 that you're referring to when you talk about --

18 A. The wood, actually -- I bet this is this way because
19 that would set -- it could be either way. The wood is --
20 this wood right in here, that -- that would be the sash, and
21 this would be frame material here. So that would be the
22 sash.

23 MR. HABAS: Just so we're clear, that's an interior
24 photograph?

25 THE WITNESS: Yes, it is. And this is all wood.

1 All this stained product we're seeing here is all
2 wood, and there is your glass, and there is frost.

3 Q. You also just referred to something called a rail.

4 A. If this is -- I can see the stamp on here, so this
5 must be taken this way. I don't think somebody would turn
6 it, but that is awful wide at the bottom. The rail is the
7 bottom portion of the window, and the style is the vertical
8 portion. Then you come up to another rail if it is the top of
9 the sash or the top of a double-hung window sash, that is --

10 Q. Okay. So we talk about the sash, we talk about the
11 area all the way around the window and then --

12 A. And the glass.

13 Q. And the glass.

14 A. And whatever the covering is on the outside.

15 Q. Okay.

16 A. Your wood -- your immediate wood, your glass, and
17 whatever the covering is on the outside, be it aluminum,
18 vinyl. It could be wood on the outside also. There are
19 windows manufactured with wood on the outside.

20 Q. So then the bottom part of the sash -- the top part
21 is considered the rail?

22 A. The rail.

23 Q. And the sides are considered the styles?

24 A. Styles, yes.

25 Q. All right. And so, when you were looking at these

1 windows from the outside, it was your opinion at least that
2 the water was seeping in and that was what was causing the
3 damage that we're seeing on the inside of the window?

4 A. Through -- by looking at a sash that we could look
5 at that opened, we could see that, you know, at the edge how
6 it had gotten in. That's -- that's what we determined by
7 looking at either loose sash in the basement or installed
8 sash in a frame that we were able to unlock and open.

9 Q. So you're saying you think that the water is
10 migrating from the outside and coming in contact with the
11 wood on the inside and that's what's causing the condition
12 that they're having with the windows?

13 A. That is -- that is a lot of it, and I had not seen,
14 because I was not there in the heating season -- the windows
15 were dry, I did not see this condition. This condition also
16 would add to that problem.

17 Q. Now, when you say "this condition," you're referring
18 to the condensation?

19 A. That's ice.

20 Q. That's ice?

21 A. Yeah. That looks a lot more like -- that's ice.
22 That's not just condensation. That's ice.

23 Q. Is that on the inside or the outside?

24 A. Yeah. That's on the inside. Yeah, that's ice. I
25 had not seen these photographs.

1 Q. With ice on the inside of the window, is that
2 typical of a window? A normal window that's performing
3 properly?

4 MR. HABAS: Objection to the form of the question.

5 Q. You can answer.

6 A. Okay. No, it is not. Ice on the inside is either a
7 thermal failure of the window not giving enough insulation
8 from the outside temperature to the inside temperature, it
9 could be -- excessive humidity in the house can cause
10 condensation and the build to an ice condition if
11 condensation is not kept in check.

12 Q. When you say "kept in check," you mean --

13 A. At an acceptable level to keep the condensation off
14 the window. A condition like this, this much ice all the way
15 around a window, can be attributed to a failure of the glass
16 system to provide a high enough insulation value to prevent
17 this from happening. It could be a failure -- I will not
18 mark on it, but I'd just like to point to it. It could be a
19 failure here where glass and whatever the product is, wood,
20 vinyl, aluminum -- whatever the product is, there is a breach
21 of thermal efficiency there to let cold in and have a cold
22 surface where ice can form. Condensation forms first, and
23 then ice forms as it just keeps building. So there could be
24 a multitude of issues going on here with that bad of an ice
25 buildup on the inside of the glass.

1 Q. When you had stated before -- you said that after
2 looking at the windows they warranted to be replaced, and is
3 that what you're referring to why you felt they needed to be
4 replaced?

5 A. Yes. Because of the damage that had been done to
6 the sash. And then I also had seen some frames that the
7 damage had migrated in farther and got to the frame also not
8 just the sash.

9 Q. Was this condition that you see, at least in that
10 photograph, and the condition you saw when you went to
11 inspect them, was that also found on the door as well?

12 A. Yes. On the center-hinge French door -- you do not
13 have any pictures of the doors?

14 Q. I do not believe I have any pictures of the door.

15 A. The door has the same perimeter around the glass,
16 and still called a style and a rail type of carpentry
17 terminology being used to describe it. The rail on the
18 bottom was deteriorated and creeping up the style on each
19 side a little bit.

20 Q. Okay.

21 A. So we did have deterioration there, too.

22 Q. I think you stated that when you were there
23 Mr. Glover had shown you some other sashes that he had
24 replaced.

25 A. Yes. He kept everything that was sent to him to

1 replace, and he kept the old product, which would be -- you
2 know, you'd see conditions like this. He kept those in his
3 basement, yes.

4 Q. They were the same condition that we see in that
5 picture there?

6 A. Minus the ice, yes.

7 Q. Just lastly, and I think you've already testified to
8 it, but I want to make sure we're clear, the estimate that
9 you've given with regards to the windows and the doors that
10 Pella can offer, those are pretty similar to the windows and
11 doors that they have in the house now?

12 A. They are identical with no extra features or
13 fashions or no different screens. We do have upgrades in
14 some of those areas, and this is not -- the wood is the same
15 on the inside. We are clad on the outside, we don't happen
16 to manufacture with a composite or a vinyl exterior. So our
17 exterior is clad in aluminum, but that is our cladding
18 through all of our lines. So that is the product that I can
19 offer.

20 Q. How long would it take to replace these windows? If
21 they were to go ahead and do this, how long would it take?

22 A. 30 windows and two doors, approximately two -- a
23 little over two weeks.

24 Q. Two weeks?

25 A. Yes.

1 Q. What's the process in terms of -- what do you have
2 to do in order to take the windows out and put the new
3 windows in?

4 A. We have to take off the interior trim and take out
5 any shims that might be holding the window in, and it should
6 be -- through proper installation, they should be shimmed,
7 they should be stuffed with insulation. Depending on the
8 exterior fastening system that might have been used with a
9 nailing fin or an incorporated J channel, or something like
10 that, our installers will have to remove those nails or cut
11 through that nailing fin to extract that window. Usually
12 windows are not nailed down through the wood sill or through
13 the side styles with finish nails. They are -- they are
14 installed with the nailing finish. So we would need to re --
15 release that from the wall or cut it if it is behind the
16 siding, and we did not want to go ahead and strip the
17 house -- strip all the siding off the house. That is very
18 time consuming, so --

19 Q. You can take the windows out without taking off any
20 of the siding of the house?

21 A. It can be done, yes, and it is done by our crews,
22 that's correct. So there are a few different ways to do
23 window replacement.

24 Q. Going back to the sash real quickly, and the
25 migration of the water you said on the edge. Now, just

1 looking at that, and again, I'm not a window expert, but how
2 much of the window actually goes back into --

3 A. How much of the glass?

4 Q. The glass, I'm sorry.

5 A. Anywhere between a half and three-quarters of an
6 inch, depending on the manufacturer -- depends on how far he
7 brings it in. This piece of molding here at the edge could
8 be an interior glazing stop, and this looks to be about
9 five-eighths to three-quarters of an inch in height there.
10 So whether this glass goes all the way here or whether it
11 stops with some spacer or just some space around it for
12 expansion and contraction, I do not know. Cutting this sash
13 at an angle would give me all that detail, or a unit section
14 in an architect digest manual by Marvin will give you that
15 information also. Different manufacturers have different
16 techniques to go ahead and put a sash together.

17 MR. FIFE: Those are all the questions I have.

18 Thank you.

19

20 REDIRECT EXAMINATION

21 BY MR. HABAS:

22

23 Q. Sir, just a follow-up. Did Mr. Glover show you any
24 photographs when you went to the home that day?

25 A. No. I had everything here -- oh, excuse me. Excuse

1 me. Yes, he did show me a couple photographs. Yes. I do
2 remember, because we were at the kitchen table, and he
3 just -- after we had looked at everything, he just showed me
4 a couple photographs of the windows.

5 Q. He wasn't asking for your comment on anything, he
6 just showed them to you?

7 A. He was asking for an estimate.

8 Q. That's what he was asking for?

9 A. Yeah. He said, what do you think happened. I said,
10 well, they failed. The product failed, and you're asking me
11 for an estimate to go ahead and see what we can do to replace
12 it for you. So -- maybe --

13 MR. HABAS: Thank you very much.

14

15 RECROSS-EXAMINATION

16 BY MR. FIFE:

17

18 Q. Just a follow-up real quick. Pictures like the one
19 I'm showing you here with condensation on the windows, those
20 are the type of photographs he showed you?

21 A. Yeah. Because they built the house, and I do
22 remember him showing me some stage -- you know, from initial
23 construction of the house, and then he did have a couple
24 pictures like that. So, yes, I -- that was a year ago. I do
25 remember him bringing that photograph album out and there

1 were some pictures, you know, of that, yes. Yes. I do
2 remember seeing that now.

3 Q. And your indication was, well, the sash had failed.
4 Did you at all state to him that that could be caused by
5 condensation?

6 A. No. No. The house -- when I used to do humidity
7 checks in houses, it's not only the window, you'll have
8 corners of closets, corners of rooms, areas behind furniture
9 that might be up to a wall. You'll have black mold, you'll
10 have problems like that in areas, and it becomes a very
11 unhealthy place to live. You'll have those things going on.
12 I did not see that anywhere in the house, and I did have to
13 move some things to get at some windows -- I mean, the house
14 has a lot of large furniture in it, and we did have to move
15 some things for me to get my measurements, and I was not
16 seeing any of that in any of the corners.

17 As soon as I'm starting to see all the windows are
18 rotting, you know, my mind goes, you know, how can I help.
19 How can I -- if they do have a black mold problem or an
20 excessive condensation problem that they aren't keeping in
21 check, let's help them out because my window -- if I sell
22 this job and put my window in there, I don't want the same
23 thing to happen. So I did not see any -- any black mold or
24 any excessive mold in any corners, behind furniture, closets.
25 I did not.

1 MR. FIFE: Thank you.

2

3

FURTHER REDIRECT EXAMINATION

4

MR. HABAS:

5

6

7

8

Q. Did you make any notations of your observations,
other than what you have already identified to us as your
notes and report?

9

10

11

12

A. No -- my pictures. Just the pictures and, like I
said, I did see -- he had the album he did show me. Because
now I remember seeing a couple pictures with the ice buildup
like that on the inside, and I did see those pictures.

13

14

Q. You said it was a one-time visit in June of '04?

15

16

17

18

A. Yes. I haven't been out to the house since.

MR. HABAS: Okay. Thank you very much. Sir, you
have the opportunity to review the transcript and
make any corrections that you would like, or you
can waive that right.

19

20

21

22

THE WITNESS: I'd like to review it.

MR. HABAS: We will make those arrangements with
the court reporter. You have 30 days in order to
send any corrections back to her.

23

24

25

(Deposition concluded at 12:28 p.m.)

| | | | |
|---|---|---|--|
| \$ | Able [4] 12:25 13:18 15:17 28:8 | Barb [1] 6:12 | Capping [1] 20:1 |
| \$44,363 [1] 19:15 | Acceptable [2] 22:24 29:13 | Barb's [1] 7:6 | Captured [2] 15:15 15:16 |
| '04 [1] 36:13 | Accurate [2] 10:20 19:16 | Barbara [2] 1:2 7:25 | Career [1] 11:8 |
| '72 [1] 24:15 | Action [1] 14 | Bars [1] 20:10 | Carpenter [1] 3:19 |
| '97 [4] 3:25 4:42 15:25 2 | Active [1] 9:24 | Basement [5] 7:11 11:22 17:15 28:7 31:3 | Carpentry [1] 30:16 |
| 0 | Adi [1] 28:16 | Basic [1] 20:24 | Casement [3] 21:14 21:14 21:15 |
| 04-209 [1] 14 | Affect [1] 26:9 | Became [2] 5:1 24:25 | Casing [1] 20:1 |
| 1 | Age [2] 7:5 31:24 | Become [2] 24:21 24:24 | Cathedral [1] 21:20 |
| 1 [1] 21:8 | Ahead [19] 6:16 7:15 8:7 9:20 9:21 10:12 11:4 11:6 13:5 13:20 19:6 19:24 21:24 24:26 29:31 21:32 16:33 16:34:11 | Becomes [1] 35:10 | Caused [1] 35:4 |
| 1001 [2] 1:14 1:22 | Air [1] 22:2 | Bedford [1] 4:10 | Causing [3] 12:23 28:2 28:11 |
| 11:37 [1] 1:13 | Album [2] 31:25 36:10 | Behalf [1] 6:7 | CEDAR [1] 1:6 |
| 12:28 [1] 36:24 | Allot [1] 6:14 | Behind [3] 32:15 35:8 35:24 | Ceiling [1] 21:21 |
| 13 [1] 1:12 | Almost [1] 9:11 | Bet [1] 26:18 | Center [1] 21:16 |
| 1400 [2] 1:15 1:22 | Aluminum [7] 20:7 20:7 21:1 26:32 7:17 29:20 31:17 | Between [4] 9:11 15:1 24:15 33:5 | Center-hinge [1] 30:12 |
| 16501 [2] 1:15 1:23 | Amount [2] 6:15 19:15 | Bit [3] 18:1 21:5 30:19 | Center-hinged [1] 21:16 |
| 16506 [2] 1:19 3:13 | Angle [1] 33:13 | Black [5] 1:11 1:24 35:9 35:19 35:23 | Certainly [5] 6:5 22:11 22:14 22:15 22:18 |
| 1972 [1] 3:25 | Answer [1] 29:5 | Blind [1] 26:1 | Certifications [2] 3:18 3:21 |
| 2 | Anyhow [1] 7:5 | Blown [1] 24:19 | Certified [1] 3:22 |
| 2004 [1] 8:14 | Apart [7] 13:3 13:4 17:8 17:10 17:11 17:16 17:18 | Blown-in [1] 24:19 | Changed [1] 4:21 |
| 2005 [1] 1:13 | Appear [2] 5:25 5:7 | Bottom [7] 16:25 17:3 17:23 27:6 27:7 27:20 30:18 | Changing [2] 21:7 21:9 |
| 2222 [1] 1:19 | Apples [2] 20:12 20:12 | Boulevard [1] 1:19 | Channel [1] 32:9 |
| 24 [1] 8:14 | Applicable [1] 20:1 | Breach [2] 14:14 29:20 | Characterize [1] 5:20 |
| 26 [1] 3:20 | Appointment [3] 6:15 8:18 8:19 | Breached [1] 13:7 | Check [4] 22:22 29:11 29:12 35:21 |
| 3 | Approached [2] 24:20 24:24 | Bring [1] 5:15 | Checks [1] 35:7 |
| 30 [5] 7:18 3:20 25:31 22:36 21 | Architect [1] 33:14 | Bringing [1] 34:25 | Circumstances [1] 6:10 |
| 6 | Area [6] 3:23 14:24 17:22 24:22 24:25 27:11 | Brings [1] 33:7 | Civil [1] 1:4 |
| 6/17 [4] 8:18 8:18 8:20 8:25 | Areas [4] 12:7 13:14 35:8 35:10 | Brought [1] 9:6 | Clad [3] 26:12 31:15 31:17 |
| 6/23 [3] 8:17 8:23 8:25 | Argon [1] 21:1 | Bryan [5] 1:2 1:18 6:21 7:10 24:8 | Cladding [7] 14:15 14:20 14:21 15:14 20:4 20:6 31:17 |
| 6/23/04 [1] 8:22 | Arrangements [1] 36:20 | Build [1] 29:10 | Cladding-to-glass [1] 14:21 |
| 6/24 [1] 8:25 | Assume [1] 20:6 | Building [1] 29:23 | Clean [1] 20:1 |
| 6/24/04 [2] 6:7 9:4 | Attributed [1] 29:15 | Buildup [2] 29:25 36:11 | Clear [3] 10:2 26:23 31:8 |
| 6110 [1] 3:13 | Aware [1] 29 | Built [1] 34:21 | Close [3] 20:8 20:12 20:14 |
| 9 | Awful [1] 27:6 | Buseck [1] 1:18 | Closed [2] 3:25 14:3 |
| 9-year-old [1] 12:15 | Awning [1] 25:21 | Business [5] 3:20 4:19 9:15 25:1 25:4 | Closets [2] 35:8 35:24 |
| A | | Businesses [1] 5:6 | Cold [3] 22:16 29:21 29:21 |
| A.....6 [1] 2:11 | B | Butch [2] 3:10 3:11 | Coleman [2] 1:14 1:22 |
| A/k/a [3] 1:6 1:6 17 | B.....6 [1] 2:12 | C | College [1] 3:15 |
| Ability [5] 14:14 19:1 19:8 23:10 | Bad | Cannot | Coming [3] 13:1 17:3 28:10 |
| | | | Commencing |

| | | | |
|--|--|---|---|
| <p>Comment [1] 34:5</p> <p>Common [1] 9:15</p> <p>Commonwealth [1] 1:12</p> <p>Company [6] 1:7 4:13 9:12 10:14 24:14 24:20</p> <p>Competition [1] 5:11</p> <p>Composite [1] 31:16</p> <p>Computer [1] 9:7</p> <p>Computers [1] 8:20</p> <p>Concerning [1] 5:16</p> <p>Concluded [1] 36:24</p> <p>Condensation [14] 22:9 22:14 22:21 23:11 23:15 28:18 28:22 29:10 29:11 29:13 29:22 34:19 35:5 35:20</p> <p>Condition [16] 7:9 10:6 10:8 10:23 11:15 16:19 22:15 28:11 28:15 28:15 28:17 29:10 29:14 30:9 30:10 31:4</p> <p>Conditions [1] 31:2</p> <p>Considered [2] 27:21 27:23</p> <p>Construction [6] 3:20 3:24 24:14 24:17 25:4 34:23</p> <p>Consumed [1] 25:1</p> <p>Consuming [1] 32:18</p> <p>Contact [5] 12:7 12:8 14:21 17:1 28:10</p> <p>Continue [1] 7:19</p> <p>Contraction [1] 33:12</p> <p>Contractor [1] 3:23</p> <p>Conventional [1] 20:11</p> <p>Conversations [1] 9:5</p> <p>Copies [3] 5:17 6:4 24:6</p> <p>Corners [4] 35:8 35:8 35:16 35:24</p> <p>Correct [6] 5:25 6:8 6:9 10:24 13:23 32:22</p> <p>Corrections [2] 36:17 36:22</p> <p>Cost [2] 10:14 10:19</p> <p>Couple [13] 7:1 8:3 9:10 9:18 9:23 12:21 13:15 16:18 18:6 34:1 34:4 34:23 36:11</p> <p>Course [1] 21:21</p> <p>Court [3] 1:1 3:8 36:21</p> <p>Covering [2] 27:14 27:17</p> <p>CPC [1] 3:22</p> <p>Crank [1] 12:6</p> <p>Created</p> | <p>Creeping [1] 30:18</p> <p>Crews [1] 32:21</p> <p>Cross-Examination [2] 2:5 24:10</p> <p>Custom [1] 20:16</p> <p>Customer [1] 6:16</p> <p>Customization [1] 20:20</p> <p>Cut [7] 13:2 13:4 13:5 13:6 17:11 32:10 32:15</p> <p>Cutting [3] 15:7 19:6 33:12</p> <p style="text-align: center;">D</p> <p>Damage [5] 7:10 15:13 28:3 30:5 30:7</p> <p>Date [4] 8:15 8:16 8:21 8:22</p> <p>Dated [1] 6:7</p> <p>Dates [2] 8:24 9:10</p> <p>Days [1] 36:21</p> <p>Debris [1] 20:2</p> <p>Decided [2] 10:3 10:6</p> <p>Decrease [1] 22:25</p> <p>Decreasing [1] 22:25</p> <p>Defects [1] 12:13</p> <p>Defendants [2] 1:8 1:20</p> <p>Dennehey [2] 1:14 1:22</p> <p>Deposition [7] 1:10 2:11 2:12 5:19 6:1 24:4 36:24</p> <p>Describe [3] 14:13 20:23 30:17</p> <p>Described [1] 19:12</p> <p>Describing [1] 25:18</p> <p>Description [1] 21:13</p> <p>Detail [2] 21:6 33:13</p> <p>Detailed [2] 21:13 21:22</p> <p>Deteriorate [1] 12:24</p> <p>Deteriorated [1] 30:18</p> <p>Deterioration [1] 30:21</p> <p>Determine [3] 12:25 13:4 17:5</p> <p>Determined [1] 28:6</p> <p>Diagonally [2] 13:6 19:7</p> <p>Different [7] 8:5 20:13 21:10 31:13 32:22 33:15 33:15</p> <p>Digest [1] 33:14</p> <p>Dining [1] 21:8</p> <p>Direct</p> | <p>Direction [2] 10:13 26:5</p> <p>Disassemble [1] 17:12</p> <p>Disassembled [2] 11:22 17:16</p> <p>Disc [2] 15:18 24:5</p> <p>Discussion [1] 13:11</p> <p>DISTRICT [2] 1:1 1:1</p> <p>Divider [1] 20:10</p> <p>Document [2] 5:25 20:22</p> <p>Documentation [1] 23:5</p> <p>Documents [2] 5:15 5:17</p> <p>Done [7] 7:10 18:2 18:3 23:8 30:5 32:21 32:21</p> <p>Door [9] 6:23 19:23 19:25 21:16 21:17 30:11 30:12 30:14 30:15</p> <p>Doors [15] 1:5 5:9 5:12 6:14 7:1 8:3 11:8 16:18 16:18 19:18 20:25 30:13 31:9 31:11 31:22</p> <p>Double [3] 21:9 21:17 27:9</p> <p>Double-hung [2] 21:9 27:9</p> <p>Down [5] 7:10 7:19 21:12 25:21 32:12</p> <p>Downloaded [1] 24:5</p> <p>Dropped [1] 7:6</p> <p>Dry [1] 28:15</p> <p>Due [1] 4:1</p> <p>Duly [1] 3:2</p> <p>During [1] 25:4</p> <p style="text-align: center;">E</p> <p>Earliest [1] 8:21</p> <p>Easily [1] 8:6</p> <p>Edge [6] 12:21 15:12 17:24 28:5 32:25 33:7</p> <p>Edinboro [1] 6:8</p> <p>Education [2] 3:14 3:18</p> <p>Efficiency [1] 29:21</p> <p>Eight [1] 4:3</p> <p>Eighths [1] 33:9</p> <p>Either [8] 5:12 7:5 8:10 9:8 12:13 26:19 28:7 29:6</p> <p>Elsewhere [1] 17:15</p> <p>Employment [1] 5:2</p> <p>Engineering [1] 3:17</p> <p>Entire</p> | <p>Entry [2] 4:20 4:23</p> <p>Erie [7] 1:4 1:15 1:19 1:23 3:13 3:23 8:12</p> <p>Esquire [2] 1:18 1:21</p> <p>Estimate [19] 5:20 6:7 6:11 6:13 6:18 7:15 7:21 7:22 8:2 8:3 10:11 10:19 11:3 16:18 18:17 23:23 31:8 34:7 34:11</p> <p>Estimating [1] 6:14</p> <p>Evaluate [6] 10:23 11:3 11:13 21:24 22:2 23:20</p> <p>Exact [1] 8:24</p> <p>Exactly [1] 25:13</p> <p>Examination [6] 2:4 2:6 2:8 3:4 33:20 36:3</p> <p>Excessive [3] 29:9 35:20 35:24</p> <p>Excuse [2] 33:25 33:25</p> <p>Exhibit [10] 2:11 2:12 5:23 6:6 9:4 19:14 20:22 20:24 21:2 21:22</p> <p>Exhibits [3] 2:10 5:19 6:1</p> <p>Existing [1] 19:23</p> <p>Expansion [1] 33:12</p> <p>Experience [4] 5:8 22:8 23:25 25:3</p> <p>Expert [3] 11:7 25:11 33:1</p> <p>Explanation [3] 18:21 19:4 19:10</p> <p>Exterior [10] 13:9 14:25 15:2 15:11 15:14 19:11 21:1 31:16 31:17 32:8</p> <p>Extra [1] 31:12</p> <p>Extract [1] 32:11</p> <p style="text-align: center;">F</p> <p>Failed [9] 7:12 7:13 13:16 18:25 25:18 26:6 34:10 34:10 35:3</p> <p>Failing [2] 7:18 7:18</p> <p>Failure [15] 12:14 12:18 14:13 14:18 14:24 15:10 18:25 19:5 19:11 23:18 23:21 29:7 29:15 29:17 29:19</p> <p>Fair [2] 5:20 6:16</p> <p>Familiar [2] 8:4 18:24</p> <p>Far [2] 17:5 33:6</p> <p>Fashions [1] 31:13</p> <p>Fastening [1] 32:8</p> <p>Faxed [3] 7:4 7:5 7:5</p> <p>Features [1] 31:12</p> <p>Felt [1] 30:3</p> <p>Ferguson</p> |
|--|--|---|---|

[illegible]

Lifer
[1] 8:12
Line
[1] 20:12
Lines
[1] 31:18
Live
[2] 3:12 35:11
Living
[2] 10:8 21:18
Local
[1] 4:8
Locally
[1] 4:9
Location
[2] 21:2 21:22
Logics
[1] 9:7
Look
[13] 8:20 9:9 10:22 12:6
12:9 12:9 12:10 14:1 14:2
15:6 15:8 26:7 28:4
Looked
[5] 12:2 12:12 16:16 18:7
34:3
Looking
[14] 12:4 13:22 13:24 14:4
14:4 15:4 15:12 25:6 25:18
27:25 28:4 28:7 30:2 33:1
Looks
[5] 6:6 18:25 19:14 28:21
33:8
Loose
[3] 11:22 15:20 28:7
Looseness
[3] 15:22 15:23 16:2
Low
[1] 21:1
Lower
[2] 16:13 17:7
LUMBER
[1] 1:6

M

Majority
[1] 17:1
Manual
[1] 33:14
Manufacture
[2] 20:8 31:16
Manufactured
[1] 27:19
Manufacturer
[1] 33:6
Manufacturers
[1] 33:15
Manufactures
[1] 20:7
Manufacturing
[1] 23:8
Mark
[3] 5:18 5:23 29:18
Marked
[1] 6:1
Marshall
[2] 1:14 1:22
Marvin
[8] 1:5 1:6 1:6 1:7 5:8 5:
13 20:14 33:14
Material
[4] 14:16 14:22 26:2 26:21
Matter
[3] 7:20 7:23 10:10
Mean
[14] 5:10 7:20 8:11 9:13
11:5 11:8 12:16 13:17 14:4
14:13 18:17 18:18 29:12 35:
13
Measured
[2] 6:22 11:17
Measurements

Mechanical
[1] 3:17
Meet
[1] 6:20
Mervin
[3] 1:10 2:3 3:9
Met
[2] 8:13 23:9
Might
[5] 11:21 14:16 32:5 32:8
35:9
Migrated
[4] 12:22 14:10 26:9 30:7
Migrating
[2] 13:6 28:10
Migration
[1] 32:25
Mind
[1] 35:18
Minus
[1] 31:6
Moisture
[1] 21:24
Mold
[4] 35:9 35:19 35:23 35:24
Molding
[1] 33:7
Monday
[1] 1:12
Money
[5] 9:14 9:21 9:25 10:1 10:
10
Moneys
[3] 7:17 9:20 9:22
Months
[2] 9:11 22:16
Most
[1] 25:1
Move
[4] 25:20 26:4 35:13 35:14
Moved
[1] 16:5
Moves
[1] 25:21
Moving
[2] 25:22 26:1
Multitude
[1] 29:24
Must
[1] 27:5

N

Nailed
[1] 32:12
Nailing
[3] 32:9 32:11 32:14
Nails
[2] 32:10 32:13
Name
[3] 3:7 3:8 3:20
Nature
[1] 15:3
Need
[7] 6:17 8:20 9:22 9:24 10:
9 13:5 32:14
Needed
[5] 8:3 10:11 18:7 23:24
30:3
Needs
[1] 19:1
Never
[3] 9:23 11:16 11:16
New
[2] 18:3 32:2
Next
[1] 14:22
Nickname
[1] 3:9
Normal

Notary
[1] 1:11
Notations
[1] 36:6
Notes
[1] 36:8
Nothing
[4] 7:21 9:19 12:16 13:17
Numbers
[1] 18:15
Numerous
[1] 18:2

O

Objection
[1] 29:4
Observations
[2] 16:7 36:6
Observe
[3] 12:18 16:11 16:23
Obtain
[1] 24:6
Obtained
[1] 5:18
Occasionally
[1] 18:24
Occur
[1] 22:9
Occurred
[1] 15:13
Offer
[5] 10:14 20:9 20:15 31:10
31:19
Offering
[1] 22:19
Office
[3] 6:12 7:3 9:9
Offices
[1] 1:13
Ohio
[1] 4:10
Old
[2] 19:19 31:1
Once
[1] 18:6
One
[13] 3:15 3:23 5:19 5:19 8:
6 8:17 11:23 13:4 15:12 15:
16 24:25 34:18 36:13
One-page
[1] 5:19
One-time
[1] 36:13
Ones
[2] 18:3 19:19
Open
[6] 12:5 17:6 19:6 21:9 21:
15 28:8
Opened
[5] 11:25 14:1 17:2 17:10
28:5
Opening
[6] 12:1 17:13 21:3 21:4
21:4 21:11
Openings
[1] 21:8
Operate
[1] 3:24
Opinion
[3] 11:7 11:9 28:1
Opportunity
[2] 11:19 36:16
Order
[4] 4:20 4:23 32:2 36:21
Ourselves
[1] 18:23
Outside
[29] 4:12 4:15 5:1 12:9 12:
10 12:12 12:19 13:23 13:24
14:2 14:6 14:9 16:8 20:6

Own
[1] 3:19
Owned
[1] 4:9
Owner
[1] 4:8

P

Page
[4] 5:19 5:25 19:21 20:22
Paperwork
[1] 8:16
Part
[7] 4:20 25:17 25:19 25:22
26:1 27:20 27:20
Part-time
[1] 4:20
Particular
[1] 25:16
Parts
[1] 17:12
Passing
[2] 14:15 14:17
Past
[2] 14:20 14:21
Path
[1] 7:19
Pella
[13] 3:22 3:22 4:2 4:11 11:
10 19:24 20:3 20:7 22:19
23:10 24:21 24:24 31:10
Pennsylvania
[3] 1:1 1:12 1:15
Per
[3] 7:3 21:6 21:23
Perform
[2] 22:5 22:24
Performing
[1] 29:2
Perimeter
[1] 30:15
Permit
[1] 9:7
Personal
[1] 3:25
Personally
[1] 8:10
Phenomenon
[1] 22:12
Phone
[5] 6:12 9:10 9:16 9:18 9:
23
Photograph
[6] 15:16 15:17 15:19 26:
24 30:10 34:25
Photographs
[6] 15:15 28:25 33:24 34:1
34:4 34:20
Picture
[2] 26:14 31:5
Pictures
[14] 12:20 12:21 15:12 24:
6 26:15 30:13 30:14 34:18
34:24 35:1 36:9 36:9 36:11
36:12
Piece
[1] 33:7
Place
[4] 12:17 17:6 17:24 35:11
Plaintiffs
[2] 1:3 1:17
PM
[1] 36:24
Point
[4] 14:17 14:21 15:1 29:18
Portion
[4] 16:13 26:3 27:7 27:8
Portions

[1] 17:17
Position
 [6] 4:6 4:11 4:14 4:16 4:21 18:18
Positions
 [4] 4:13 4:18 4:24 5:2
Preliminary
 [1] 8:16
Prepared
 [1] 7:3
Preparing
 [1] 8:25
Prequalify
 [1] 6:19
Present
 [3] 4:4 4:5 4:14
Press
 [1] 16:1
Pretty
 [3] 7:4 23:6 31:10
Prevent
 [2] 23:11 29:16
Previously
 [2] 5:18 19:12
Problem
 [8] 11:4 11:11 19:2 25:7 25:9 28:16 35:19 35:20
Problems
 [1] 35:10
Process
 [2] 12:3 32:1
Product
 [15] 7:18 7:24 8:4 8:7 8:8 15:6 20:9 20:12 24:23 27:1 29:19 29:20 31:1 31:18 34:10
Products
 [3] 1:7 15:5 20:13
Professionally
 [1] 8:10
Program
 [3] 3:22 8:19 9:7
Project
 [2] 9:20 10:1
Projects
 [1] 24:23
Proper
 [1] 32:6
Properly
 [2] 22:23 29:3
Proportion
 [1] 23:3
Proposal
 [3] 5:24 6:7 19:20
Provide
 [4] 18:21 21:16 23:22 29:16
Provided
 [2] 5:17 24:5
Provides
 [1] 25:22
Providing
 [1] 21:23
Public
 [1] 1:11
Published
 [2] 23:4 23:7
Put
 [6] 7:13 18:4 21:10 32:2 33:16 35:22
Putting
 [1] 7:23

Q

Quantity
 [2] 21:8 21:19
Quarters
 [2] 33:5 33:9
Questions
 [4] 23:10 23:14 24:3 33:17
Quick
 [2] 24:14 34:18

Quickly
 [1] 32:24
Quinn
 [1] 1:18
Quite
 [1] 18:24
Quotation
 [1] 19:14
Quote
 [11] 6:25 7:3 8:24 9:3 9:13 10:5 11:10 11:13 18:20 19:15 20:15
Quoting
 [2] 4:22 9:16

R

Rail
 [9] 17:25 18:2 27:3 27:6 27:8 27:21 27:22 30:16 30:17
Re
 [1] 32:14
Readily
 [1] 15:17
Real
 [3] 24:13 32:24 34:18
Really
 [1] 18:19
Realtor
 [1] 8:4
Realty
 [1] 8:5
Reason
 [4] 8:1 11:1 11:5 11:14
Recross-Examination
 [2] 2:7 34:15
Redirect
 [4] 2:6 2:8 33:20 36:3
Referred
 [1] 27:3
Referring
 [3] 26:17 28:17 30:3
Reflect
 [1] 8:22
Regards
 [1] 31:9
Reimbursed
 [1] 10:1
Related
 [1] 20:2
Relationship
 [1] 8:9
Release
 [1] 32:15
Remainder
 [1] 14:2
Remember
 [5] 34:2 34:22 34:25 35:2 36:11
Remodeling
 [1] 24:18
Remove
 [4] 11:25 19:19 19:23 32:10
Removed
 [1] 17:15
Replace
 [9] 7:15 10:3 10:19 18:5 19:18 23:19 31:1 31:20 34:11
Replaced
 [13] 6:24 7:9 7:12 10:7 13:14 18:5 18:6 18:8 18:12 19:1 30:2 30:4 30:24
Replacement
 [3] 8:8 10:12 32:23
Replacing
 [2] 13:19 23:17
Report
 [1] 36:8
Reported
 [1] 1:24

Reporter
 [2] 3:8 36:21
Reporting
 [1] 1:25
Request
 [1] 7:4
Requested
 [1] 6:13
Required
 [1] 9:12
Review
 [2] 36:16 36:19
Revisited
 [1] 9:23
Right-hinge
 [1] 21:14
Road
 [1] 3:13
Rocket
 [1] 12:16
Roofing
 [1] 24:18
Room
 [6] 21:2 21:6 21:8 21:13 21:19 21:22
Rooms
 [1] 35:8
Rot
 [1] 26:10
Rotted
 [3] 17:22 23:23 23:25
Rotting
 [10] 16:14 16:20 17:2 17:3 17:4 17:6 17:24 18:22 19:5 35:18
Rough
 [1] 12:1
Route
 [1] 13:20
Rubber
 [1] 15:8

S

Sales
 [6] 4:12 4:15 4:22 4:25 5:1 9:7
Sash
 [50] 7:11 7:13 11:25 12:8 12:8 12:9 12:13 12:14 12:14 12:21 12:23 13:2 13:3 13:5 13:10 13:13 14:4 14:10 14:14 15:19 15:20 16:16 16:25 17:3 17:4 17:22 17:23 17:25 18:1 18:2 23:23 25:14 25:17 25:19 26:6 26:20 26:22 27:9 27:9 27:10 27:20 28:4 28:7 28:8 30:6 30:8 32:24 33:12 33:16 35:3
Sashes
 [2] 23:25 30:23
Sat
 [1] 8:6
Saw
 [4] 11:16 15:2 19:13 30:10
Scale
 [2] 23:1 23:4
Science
 [1] 12:16
Screens
 [3] 20:11 21:2 31:13
Screws
 [1] 17:12
Seal
 [13] 12:14 12:18 14:13 14:18 14:19 14:23 15:3 15:10 18:24 19:5 19:11 19:12 19:24
Season
 [1] 28:14
Second
 [2] 18:4 18:9
Section

See
 [29] 3:10 8:16 10:8 11:20 12:13 12:16 13:5 13:7 14:3 14:9 15:25 16:1 21:6 21:12 25:9 25:25 26:8 27:4 28:5 28:15 30:9 31:2 31:4 34:11 35:12 35:17 35:23 36:10 36:12
Seeing
 [5] 27:1 28:3 35:2 35:16 36:11
Seeping
 [1] 28:2
Sell
 [1] 35:21
Seminars
 [2] 8:5 8:6
Send
 [1] 36:22
Sending
 [1] 13:19
Sense
 [1] 9:15
Sent
 [2] 7:18 30:25
Separated
 [1] 18:3
Set
 [7] 5:16 6:15 17:21 17:22 18:4 18:4 26:19
Sets
 [1] 13:15
Shades
 [1] 20:11
Shimmed
 [1] 32:6
Shims
 [1] 32:5
Shot
 [1] 13:17
Show
 [8] 12:20 17:14 17:19 23:2 26:14 33:23 34:1 36:10
Showed
 [6] 7:11 17:23 18:2 34:3 34:6 34:20
Showing
 [8] 12:21 13:13 13:14 13:16 21:22 23:23 34:19 34:22
Shown
 [4] 10:7 10:25 26:15 30:23
Showroom
 [1] 4:21
Shows
 [1] 15:12
Side
 [3] 21:17 30:19 32:13
Side-hinged
 [1] 21:17
Sideline
 [1] 24:20
Sides
 [2] 17:4 27:23
Siding
 [4] 24:19 32:16 32:17 32:20
Signed
 [1] 3:10
Sill
 [1] 32:12
Similar
 [1] 31:10
Single
 [2] 21:4 21:15
Six
 [2] 5:25 20:22
Six-page
 [2] 5:25 20:22
Sizes
 [2] 7:2 20:17
Sold
 [1] 5:12

Solution
[1] 11:10
Sometimes
[2] 6:25 8:5
Sondra
[2] 1:11 1:24
Soon
[1] 35:17
Sorry
[2] 8:17 33:4
Sounds
[1] 10:18
Source
[2] 12:25 13:8
Space
[1] 33:11
Spacer
[1] 33:11
Special
[1] 20:19
Spell
[1] 3:7
Spent
[1] 9:13
Stage
[1] 34:22
Stained
[1] 27:1
Stamp
[1] 27:4
Standard
[4] 20:16 20:18 23:6 23:7
Start
[3] 10:11 17:25 26:9
Started
[2] 4:20 24:18
Starting
[1] 35:17
State
[4] 1:14 1:22 3:21 35:4
STATES
[1] 1:1
Stating
[1] 21:3
Still
[7] 7:22 9:19 9:24 9:24 15:19 15:20 30:16
Stop
[1] 33:8
Stops
[1] 33:11
Street
[2] 1:15 1:22
Strip
[2] 32:16 32:17
Stripping
[1] 12:8
Study
[1] 3:16
Stuffed
[1] 32:7
Style
[4] 18:1 27:7 30:16 30:18
Styles
[3] 27:23 27:24 32:13
Submitting
[1] 9:3
Subpoena
[1] 5:17
Subsequently
[1] 7:13
Suite
[2] 1:15 1:22
Summary
[1] 19:20
Supply
[1] 19:25
Supposed
[2] 6:19 6:19
Surface

Swanville
[1] 3:13
Sworn
[1] 3:2
Synopsis
[1] 20:25
System
[2] 29:16 32:8

T

Table
[1] 34:2
Techniques
[1] 33:16
Temperature
[4] 23:1 23:3 29:8 29:8
Temperatures
[2] 22:16 22:17
Terminology
[1] 30:17
Terms
[10] 12:3 13:22 14:18 14:23 15:6 15:22 19:11 19:14 25:11 32:1
Testified
[2] 3:2 31:7
Testimony
[1] 10:18
Testing
[2] 22:5 23:8
Tests
[1] 19:7
That'll
[1] 5:23
Theirs
[1] 10:15
Themselves
[4] 9:21 10:23 11:14 22:6
Thermal
[2] 29:7 29:21
They've
[1] 9:13
Three
[4] 4:17 9:11 33:5 33:9
Three-quarters
[2] 33:5 33:9
Timing
[1] 6:21
Today
[1] 5:17
Together
[1] 33:16
Toohey
[1] 1:18
Took
[3] 7:2 7:10 8:23
Tooling
[1] 19:9
Top
[3] 27:8 27:9 27:20
Tore
[1] 13:14
Total
[1] 19:15
Transcript
[1] 36:16
Transoms
[1] 21:10
Trapezoids
[2] 21:19 21:20
Trim
[1] 32:4
Trying
[4] 7:16 9:20 9:25 21:5
Turn
[1] 27:5
Twice
[2] 18:10 18:12
Twin

Two
[6] 20:25 21:14 31:22 31:22 31:23 31:24
Tyler
[10] 1:10 2:3 2:11 2:12 3:9 3:9 3:20 3:24 6:1 24:13
Type
[3] 24:17 30:16 34:20
Types
[1] 24:1
Typical
[1] 29:2

U

Um-hum
[3] 3:19 20:24 25:15
Under
[4] 3:20 6:10 19:20 22:25
Underneath
[1] 12:9
Unhealthy
[1] 35:11
Union
[1] 3:19
Unit
[1] 33:13
UNITED
[1] 1:1
Units
[3] 19:24 19:24 19:25
Unlock
[3] 12:5 25:20 28:8
Unlocked
[1] 17:10
Unlocking
[2] 17:13 26:4
Unusual
[1] 22:12
Up
[17] 9:1 9:9 9:13 9:16 9:18 9:22 17:2 17:4 17:25 23:2 25:1 25:21 27:8 30:18 33:23 34:18 35:9
Upgrades
[1] 31:13

V

Value
[1] 29:16
Various
[1] 3:21
Ventilation
[4] 24:20 25:20 25:23 26:5
Vertical
[1] 27:7
Vibrated
[1] 16:5
View
[1] 14:6
Vintages
[1] 18:24
Vinyl
[5] 20:6 26:3 27:18 29:20 31:16
Visit
[1] 36:13

W

Waive
[1] 36:18
Wall
[4] 7:21 21:21 32:15 35:9
Warmer
[1] 22:17
Warner
[2] 1:14 1:22
Warranted
[1] 30:2
Warrants

Water
[12] 12:22 12:25 13:9 14:10 14:15 14:16 14:20 19:1 26:8 28:2 28:9 32:25
Ways
[2] 13:4 32:22
Weather
[1] 12:8
Week
[1] 9:2
Weeks
[2] 31:23 31:24
West
[1] 1:19
WESTERN
[1] 1:1
Whatnot
[1] 25:7
Whatsoever
[1] 23:14
White
[1] 21:1
Whole
[2] 11:8 16:17
Whole-house
[1] 16:17
Wide
[1] 27:6
Wife
[1] 1:3
Willing
[1] 13:20
Window
[63] 3:22 6:23 7:22 10:11 10:14 12:5 12:6 12:6 12:23 14:1 14:2 14:14 14:19 14:24 14:25 14:25 15:11 16:2 16:13 16:17 16:22 17:13 19:23 19:25 21:4 21:4 21:4 21:5 21:9 21:15 22:8 23:2 23:8 23:21 23:22 24:21 25:11 25:19 25:21 25:22 25:24 26:1 26:3 26:4 26:12 27:7 27:9 27:11 28:3 29:1 29:2 29:2 29:7 29:14 29:15 32:5 32:11 32:23 33:1 33:2 35:7 35:21 35:22
Windows
[90] 1:5 1:6 5:9 5:12 6:13 6:14 7:1 7:8 7:9 7:15 7:17 7:21 8:3 10:3 10:6 10:20 10:22 11:7 11:8 11:14 11:17 11:21 11:25 12:3 12:12 12:19 13:23 13:24 14:7 15:23 16:5 16:8 16:11 16:15 16:18 16:19 16:21 16:24 17:1 17:2 17:4 17:7 17:8 17:11 17:12 17:14 17:19 17:21 18:5 18:7 18:10 18:12 18:20 18:23 19:18 20:3 20:16 20:25 21:14 22:3 22:5 22:10 22:19 22:23 23:10 23:15 23:17 23:18 24:1 24:25 25:3 25:7 26:7 27:19 28:1 28:12 28:14 30:2 31:9 31:10 31:20 31:22 32:2 32:3 32:12 32:19 34:4 34:19 35:13 35:17
Winter
[1] 22:15
Withstand
[1] 23:11
WITNESS
[3] 24:7 26:25 36:19
Wood
[31] 1:7 12:22 14:22 15:14 16:13 17:1 17:3 18:22 20:3 20:8 20:10 20:10 21:1 26:3 26:9 26:11 26:12 26:16 26:18 26:19 26:20 26:25 27:2 27:16 27:16 27:18 27:19 28:11 29:19 31:14 32:12
Wrote
[1] 9:1